

ESTTA Tracking number: **ESTTA633898**

Filing date: **10/20/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92059987
Party	Defendant JUN Co., Ltd.
Correspondence Address	JOAN OPTICAN HERMAN HOVEY WILLIAMS LLP 10801 MASTIN BLVD, STE 1000 OVERLAND PARK, KS 66210 UNITED STATES tmdocketing.herman@hoveywilliams.com
Submission	Other Motions/Papers
Filer's Name	Cheryl L. Burbach
Filer's e-mail	jherman@hoveywilliams.com, cburbach@hoveywilliams.com, litigation@hoveywilliams.com
Signature	/Cheryl L. Burbach/
Date	10/20/2014
Attachments	Consent to Motion to Consolidate_92059987.pdf(161782 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

SOUTH CONE, INC.,)	
)	
Petitioner,)	
)	
v.)	Cancellation No. 92059987
)	
JUN CO., LTD.,)	Mark: REEFUR
)	
Registrant.)	

**CONSENT TO CONSOLIDATION OF PROCEEDINGS AND REQUEST TO RE-SET
THE CONFERENCE, DISCOVERY, DISCLOSURE AND TRIAL SCHEDULE**

Registrant, Jun Co., Ltd. consents to Petitioner's request to consolidate the proceedings contained in the *Motion to Consolidate*, both in the instant proceeding and in Opposition No. 91218665, filed by Petitioner on October 7, 2014. However, Registrant reserves the right to respond to the factual and legal allegations contained in the referenced Motion pertaining to allegations from the Petition for Cancellation. Registrant does not waive its right to dispute those allegations.

Furthermore, Registrant respectfully requests the Board re-set the current scheduling order following the consolidation of the proceedings. Registrant requests the Board set a single, consolidated date for Registrant to answer or otherwise plead in response to the Notice of Opposition and the Petition for Cancellation in the interest of judicial economy. The current deadline for Registrant to answer or otherwise respond is October 29, 2014 for the instant proceeding, and November 12, 2014 for the Opposition No. 91218665.

WHEREFORE, for good cause shown, Registrant respectfully requests that the Board consolidate Opposition No. 91218665 and Cancellation No. 92059987, and re-set the current

schedule to allow for Registrant to answer or otherwise respond to the operative pleadings on a date that fits a consolidated schedule.

Dated: October 20, 2014

Respectfully submitted,

HOVEY WILLIAMS LLP

By s/ Cheryl L. Burbach

Joan Optican Herman
Cheryl L. Burbach
10801 Mastin Blvd., Suite 1000
84 Corporate Woods
Overland Park, KS 66210
Telephone: 913.647.9050
Facsimile: 913.647.9057
Email: joh@hoveywilliams.com
clb@hoveywilliams.com

ATTORNEYS FOR REGISTRANT
JUN CO., LTD.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was deposited with the United States Postal Service as first class mail, postage prepaid, on this 20th day of October, 2014 to:

Brooks R. Bruneau, Esq.
PORZIO, BROMBERG & NEWMAN, PC
29 Thanet Road, Suite 201
Princeton, NJ 08540
Tel.: (609) 924-8555

ATTORNEYS FOR PETITIONER
SOUTH CONE, INC.

s/ Cheryl L. Burbach